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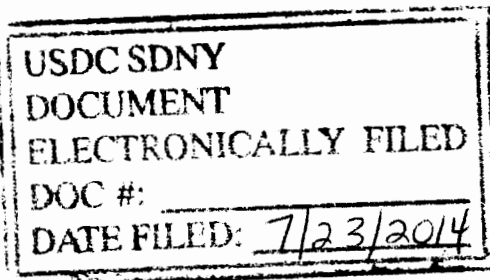
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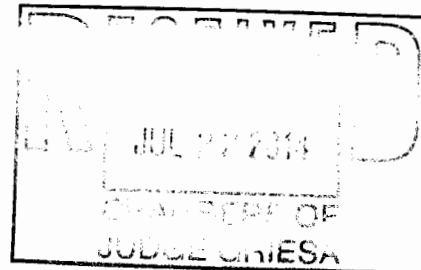
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July 21, 2014

By Hand

The Honorable Thomas P. Griesa
United States District Court
for the Southern District of New York
500 Pearl Street
New York, NY 10007



Allianz Risk Transfer AG, et al. v. Paramount Pictures Corporation,
No. 08-CV-10420 (TPG)

Dear Judge Griesa:

We are counsel to the defendant, Paramount Pictures Corporation, in the above action. We write respectfully to request leave of the Court to file a single reply memorandum of law not to exceed 25 pages in further support of defendant's motion for summary judgment on claims against all plaintiffs. The Court previously approved page enlargements for moving briefs of 45 pages for each side for initial and opposition briefs, but neither the parties nor the Court have addressed the length of reply briefs. Currently, Paramount's reply memorandum is due this Friday, July 25.

Background

We request this enlargement of pages to respond adequately to plaintiffs' 45-page opposition brief, which addresses claims asserted by four distinct plaintiffs, each of

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which asserts three legal claims, and the voluminous new materials which plaintiffs have submitted in connection with their opposition. Specifically, after having defendant's moving papers for some *ten weeks*, plaintiffs have now filed:

- (1) a 45-page opposition brief;
- (2) an 87-page Rule 56.1 Statement, which includes 24 pages of "Additional Material Facts";
- (3) six new declarations from five fact witnesses and an expert; and
- (4) some 107 document exhibits beyond those filed by defendant.

We continue to believe that this case can and should be resolved on this summary judgment motion, and that the large size of plaintiffs' opposition papers represents a meritless effort to create material, disputed issues of fact even though none exists. Nonetheless, given the volume of materials plaintiffs have filed, we respectfully request a 25-page limit for our reply memorandum, so that we may adequately address plaintiffs' arguments and entirely new materials.

Surprisingly, plaintiffs have, without offering us any explanation, outright refused to agree to our request for a 25-page limit on our reply memorandum.

Conclusion

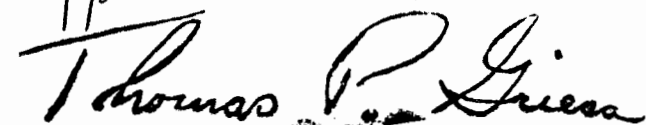
In sum, defendant respectfully requests that the Court authorize defendant's proposed 25-page limit for its reply memorandum.

Respectfully submitted,



Andrew J. Ehrlich

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(all by e-mail attachment)

Approved 7/23/2014


MEMO ENDORSED

Granted [